

**IN THE UNITED STATES DISTRICT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

CRAIGVILLE TELEPHONE CO. d/b/a	)	
ADAMSWELLS; and CONSOLIDATED	)	
TELEPHONE COMPANY d/b/a CTC	)	
	)	
Plaintiff,	)	No. 1:19-cv-07190
	)	
vs.	)	Judge John Z. Lee
	)	Magistrate Judge Jeffrey T. Gilbert
T-MOBILE USA, INC.; and	)	
INTELIQUENT, INC.	)	
	)	
Defendants.	)	

**INTELIQUENT’S MOTION  
FOR LEAVE TO FILE DOCUMENTS UNDER SEAL**

Inteliquent, Inc. (Inteliquent”), respectfully moves pursuant Local Rules 5.8 and 26.2 for leave to seal select text from Inteliquent’s Response in Opposition to the Plaintiffs’ Motion to Compel against Inteliquent (the “Response”) and certain exhibits filed in support of its Response (Exs. C-D, F-N, Q-T). In support of this request, Inteliquent states:

1. All the documents listed above are being filed concurrently with the present motion to seal.

2. The documents listed above and the redacted portions of Inteliquent’s Response rely on or directly quote documents referencing certain confidential business and contractual matters that the parties or third parties responding to discovery have designated as Confidential or Highly Confidential pursuant to the Confidentiality Order (ECF 164) entered in this case. The Confidentiality Order limits the disclosure of those documents. (*Id.* ¶ 5.) The materials also respond to redacted and sealed portions of the plaintiffs’ motion. (ECF 226.)

3. Good cause exists to file these materials under seal because disclosure of the information related to the parties’ confidential business arrangements and competitively sensitive

information would almost certainly put one or more of the parties or the third parties that responded to discovery at a disadvantage in the highly competitive telecommunications marketplace in which they operate. The materials being filed under seal include “information that reveals trade secrets” and “research, technical, commercial or financial information...maintained as confidential.” (ECF 164 ¶ 2(a).)

4. Further, to comply with the confidentiality obligations under relevant contracts involving Inteliquent, and in the interest of justice, Inteliquent is requesting that the Court permit Inteliquent to file confidential materials in connection with its Response.

5. Along with this motion, Inteliquent is filing public versions of its Response from which the confidential portions have been redacted. These redacted versions of the Response and the non-Confidential exhibits will remain on the docket to ensure public access to the non-confidential portions of Inteliquent’s filings.

WHEREFORE, Inteliquent requests that this Court should grant this Motion and enter an order giving Inteliquent leave to file under seal the redacted portions of its Response in Opposition to the Plaintiffs’ Motion to Compel against Inteliquent and (b) certain supporting exhibits designated as Confidential or Highly Confidential.

Dated: March 1, 2022

Respectfully submitted,

By: /s/ John J. Hamill

John J. Hamill

john.hamill@dlapiper.com

Michael S. Pullos

michael.pullos@us.dlapiper.com

Devin Carpenter

devin.carpenter@us.dlapiper.com

DLA PIPER LLP (US)

444 West Lake Street, Suite 900

Chicago, Illinois 60606

Tel: 312.368.7036/2176

Fax: 312.251.5809/312.630.6350

*Attorneys for Inteliquent, Inc.*

**CERTIFICATE OF SERVICE**

The undersigned attorney, on oath, certifies that on March 1, 2022 he served the foregoing **Motion for Leave to File Documents Under Seal** via the ECF system to all parties that have consented to same in accordance with applicable Federal Rules of Civil Procedure and Local Rules of the U.S. District Court for the Northern District of Illinois.

By: /s/ John J. Hamill  
John J. Hamill